

EXHIBIT 67

From: Oluwole, Chautney M.
Sent: Wednesday, September 23, 2020 6:08 PM
To: Scott, Elizabeth D.; McClammy, James I.
Cc: Kaminetzky, Benjamin S.; Duggan, Charles S.; Clarens, Margarita; Huebner, Marshall S.; purdue.dpw.diligence; Troop, Andrew (External); Alfano, Andrew (External); Sharp, Jason (External); keckstein@kramerlevin.com; rringer@kramerlevin.com; Schinfeld, Seth F.; BCohen@KRAMERLEVIN.com; Hurley, Mitchell; apreis@akingump.com; PPLP Group; PUR UCC PRIV TEAM
Subject: RE: In re: Purdue Pharma L.P. et al., No. 19-23649 (Bankr. S.D.N.Y.) - Letter to Debtors

Hi Elizabeth,

We are in receipt of your September 21, 2020 letter, which seems repetitive of the issues raised in the UCC's August 30, 2020 letter. As stated in our September 8, 2020 letter, your position that communications "copying third party individuals or entities ... vitiates any claim of privilege" is not consistent with the law. Despite the UCC's continuous attempt to apply a blanket rule with respect to third parties, we repeat our previous position that this determination must be made on a document-by-document basis. The many exhibits to the UCC's 90 page communication seem to indicate that the UCC has selected every single document in the supplemental log which includes a third party, as opposed to engaging in a thoughtful, selective exercise of actually reviewing the detailed information included on the log such as subject, date, all participants, type of privilege claims and log descriptions to determine whether the presence of the third party may actually waive any applicable privilege. We have engaged in this thoughtful exercise, and we continue to do so. We are happy to consider any specific challenges to entries on the log, and as previously promised, we will produce any documents that are determined to be not privileged after additional review. We will also endeavor to provide additional information about persons and entities that the UCC has identified as "unknown."

Given our good faith offer to continue to consider specific document challenges raised by the UCC, and to produce any documents that are determined to be not privileged, we do not think we are at an impasse. Nor do we think it is necessary to provide amended logs within arbitrary timelines set by the UCC. We will provide amended versions of the logs produced in the bankruptcy to date by next week, and Monday's document production will include any documents that have been determined to be not privileged after additional review.

We are available to further discuss any remaining issues.

Thanks,

Chautney

Chautney M. Oluwole

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From: Scott, Elizabeth D. <EDScott@AKINGUMP.com>
Sent: Monday, September 21, 2020 5:20 PM
To: McClammy, James I. <james.mcclammy@davispolk.com>
Cc: Kaminetzky, Benjamin S. <ben.kaminetzky@davispolk.com>; Duggan, Charles S. <charles.duggan@davispolk.com>; Clarens, Margarita <margarita.clarens@davispolk.com>; Huebner, Marshall S. <marshall.huebner@davispolk.com>; Oluwole, Chautney M. <chautney.oluwole@davispolk.com>; purdue.dpw.diligence <purdue.dpw.diligence@davispolk.com>; Troop, Andrew (External) <andrew.troop@pillsburylaw.com>; Alfano, Andrew (External) <andrew.alfano@pillsburylaw.com>; Sharp, Jason (External) <jason.sharp@pillsburylaw.com>; keckstein@kramerlevin.com; rringer@kramerlevin.com; Schinfeld, Seth F. <SSchinfeld@KRAMERLEVIN.com>; BCohen@KRAMERLEVIN.com; Hurley, Mitchell <mhurley@AkinGump.com>; apreis@akingump.com; PPLP Group <PPLPGroup@akingump.com>; PUR UCC PRIV TEAM <PURUCCPRIVTEAM@akingump.com>
Subject: In re: Purdue Pharma L.P. et al., No. 19-23649 (Bankr. S.D.N.Y.) - Letter to Debtors

Counsel,

Please see the attached correspondence in connection with the above-referenced matter.

Thank you,

Elizabeth Scott
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